

EXHIBIT 2

Declaration of Leah Godesky

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,)	Case No. 16-cv-1054 (WMW/DTS)
)	
)	
Plaintiff,)	
)	
v.)	Jury Trial Demanded
)	
FEDERAL INSURANCE COMPANY, an)	
Indiana corporation,)	
)	
Defendant.)	
)	

**NOTICE OF DEPOSITION UNDER
FED.R.CIV.P. 30(b)(6) OF FEDERAL INSURANCE COMPANY**

TO: Federal Insurance Company
c/o Lora M. Friedemann
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200 South Sixth Street, Suite 4000
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PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Fair Isaac Corporation (“FICO”) will take the deposition upon oral examination of Defendant Federal Insurance Company (“Federal”) by its designated witness or witnesses regarding the topics identified in Attachment A attached hereto at 9:30 a.m. on Thursday, April 26, 2018, at the offices of Merchant & Gould, 3200 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota. The deposition will be taken before and transcribed by a notary public or other officer authorized to administer oaths and record testimony. The testimony will be recorded by stenographic means and may be recorded by videographic means.

Dated: April 11, 2018

MERCHANT & GOULD P.C.

/s/ Allen Hinderaker

Allen Hinderaker, MN Bar # 45787

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ATTACHMENT A

INSTRUCTIONS

1. You are required to appear at the taking of a deposition to testify responsive to the following topics. You are required to furnish such information as is available to you, including, but not limited to, information known to your officers, employees, agents, or anyone acting for or on your behalf.
2. If you have no information about the subject of a particular category or if for some reason you are unable to answer it, the response should specifically so state.
3. If you assert a claim of privilege in objection to any topic or question, identify the nature and basis of the privilege claimed, and provide as much of the following information as is not encompassed by the privilege: type; general subject matter and purpose; date; the names of persons making or receiving the communication, and of those present when it was made; the relationship of the named person to the author or speaker; and any other information upon which you may rely to support your claim of privilege or the immunity from discovery.

30(b)(6) DEPOSITION TOPICS

1. A general overview of the business of Federal Insurance Company (“Federal”), including:
 - (a) Identification of all entities directly or indirectly controlled by Federal, both in the United States and internationally, from December 2006 through January 14, 2016 where “control” means the ownership of more than 50% of the aggregate of all voting interests (representing the right to vote for the election of directors or other managing authority), and a general overview of the business of each such entity;

(b) Identification of all subsidiaries of Federal, both in the United States and internationally, from December 2006 through January 14, 2016, and a general overview of the business of each subsidiary;

(c) Identification of all entities directly or indirectly controlled by Federal, both in the United States and internationally, from January 14, 2016, to the date of the deposition where “control” means the ownership of more than 50% of the aggregate of all voting interests (representing the right to vote for the election of directors or other managing authority), and a general overview of the business of each such entity;

(d) Identification of all subsidiaries of Federal, both in the United States and internationally, from January 14, 2016, to the date of the deposition, and a general overview of the business of each subsidiary;

(e) Identification of each entity directly or indirectly controlled by Federal and each subsidiary of Federal that has installed the Blaze Advisor® software on its servers from June 2006 to the date of the deposition, including the date of each such installation;

(f) Identification of each division of Federal from June 2006 through January 14, 2016, and a general overview of the business of each division;

(g) Identification of each division of Federal from January 14, 2016, to the date of the deposition, and a general overview of the business of each division.

(h) Identification of each division of Federal that has installed the Blaze Advisor® software on its server from June 2006 to the date of the deposition, including the date of each use installation.

2. A general overview of the business of Chubb & Son, a division of Federal, including:

(a) An overview of the business of Chubb & Son, a division of Federal, as servicer for The Chubb Corporation and its non-insurance company subsidiaries from December 2006 to January 14, 2016;

(b) An overview of the business of Chubb & Son, a division of Federal, as servicer for The Chubb Corporation and its non-insurance company subsidiaries from January 14, 2016 to the date of the deposition;

(c) Identification of each non-insurance company subsidiary of The Chubb Corporation serviced by Chubb & Son, a division of Federal, that has installed the Blaze Advisor® software on its servers and the date of each such installation.

(d) An overview of the business of Chubb & Son, a division of Federal, as manager of The Chubb Corporation insurance company subsidiaries from December 2006 to January 14, 2016;

(e) An overview of the business of Chubb & Son, a division of Federal, as manager of The Chubb Corporation insurance company subsidiaries from January 14, 2016 to the date of the deposition;

(f) Identification of each insurance company subsidiary of The Chubb Corporation managed by Chubb & Son, a division of Federal, that has installed the Blaze Advisor® software on its servers and the date of each such installation.

(g) Identification of all entities directly or indirectly controlled by Chubb & Son, a division of Federal, both in the United States and internationally, from December 2006 through January 14, 2016 where “control” means the ownership of more than 50%

of the aggregate of all voting interests (representing the right to vote for the election of directors or other managing authority), and a general overview of the business of each such entity;

(h) Identification of all entities directly or indirectly controlled by Chubb & Son, a division of Federal, both in the United States and internationally, from January 14, 2016 to the date of the deposition where “control” means the ownership of more than 50% of the aggregate of all voting interests (representing the right to vote for the election of directors or other managing authority), and a general overview of the business of each such entity.

(i) Identification of each entity directly or indirectly controlled by Chubb & Son, a division of Federal, both in the United States and internationally, where “control” means the ownership of more than 50% of the aggregate of all voting interests (representing the right to vote for the election of directors or other managing authority), that has installed the Blaze Advisor® software on its servers from June 2006 to the date of the deposition, including the date of each such installation.

3. An overview of Federal’s financial reporting, including:

(a) Whether Federal prepares its financial statements to comply with Generally Accepted Accounting Principles (“GAAP”);

(b) Whether Federal separately reports the revenue and expense of each of its divisions;

(c) Identification of each entity and each subsidiary of Federal (as identified in response to topics 1(a)-(d) above) whose revenue and expense are consolidated into the revenue and expense of Federal in Federal’s financial reporting.

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2018, a copy of the foregoing was emailed to the following attorneys of record:

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April 11, 2018

s/Allen Hinderaker
Allen Hinderaker